

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FEDERAL TRADE COMMISSION,

STATE OF NEW YORK, and

STATE OF FLORIDA,

Plaintiffs,

v.

THE TAX CLUB, INC., et al.,

Defendants, and

SANDRA C. SAVAGE,

Relief Defendant.
-----X

Case No. 13-CV-210 (JMF)

AMENDED NOTICE OF FIRST JOINT APPLICATION OF PETER B. ZLOTNICK, ESQ. AS LIQUIDATOR, FARRELL FRITZ, P.C., BSD ADVISORS, LLC, AND KARR TUTTLE CAMPBELL, P.S. FOR AN ORDER AUTHORIZING THE PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES PURSUANT TO THE STIPULATED FINAL JUDGMENTS AND ORDERS ENTERED JUNE 2, 2014

PLEASE TAKE NOTICE, that upon the annexed Amended Declaration of the court-appointed liquidating receiver, Peter B. Zlotnick, Esq. (the "Liquidator"), dated August 15, 2014, together with the exhibits annexed thereto, the Declaration of Hernan Serrano, dated August 12, 2014, together with the exhibits annexed thereto, the Declaration of Diana K. Carey, dated August 14, 2014, together with the exhibits annexed thereto, and the accompanying Amended Memorandum of Law, the Liquidator, together with his counsel Farrell Fritz, P.C., his financial consultants BSD Advisors, LLC, and his local counsel in Seattle, Washington, Karr Tuttle Campbell, P.S., through his undersigned counsel will apply to the Court at 40 Foley Square, New York, New York, at a date to be determined by this Court for an Order: (i) authorizing the

payment of compensation for their professional fees and reimbursement of actual out-of-pocket expenses for the period June 2, 2014 through July 31, 2014, in the total aggregate amount of \$357,146.85,¹ consisting of \$335,760.87 in professional hourly time charges and \$21,385.98 in actual out-of-pocket expenses, pursuant to Section VI.J of the Stipulated Final Judgment and Order for Permanent Injunction and Monetary Relief as to the Corporate Defendants and Individual Defendants Brendon A. Pack and Michael M. Savage, and Section V.I of the Stipulated Final Judgment and Order for Permanent Injunction and Monetary Relief as to Defendant Edward B. Johnson, both entered by the Court on June 2, 2014.

PLEASE TAKE FURTHER NOTICE, that opposition to this Application, if any, must be served so as to be received by the undersigned no later than two (2) weeks after receipt of these moving papers and reply papers, if any, shall be served no later than five (5) business days after receipt of the opposition papers.

Dated: New York, New York
September 5, 2014

Respectfully submitted,

FARRELL FRITZ, P.C.

/s/ Peter B. Zlotnick

By: _____
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¹ Prior to the filing of this joint application, but after FF, BSD and KTC had finalized their firm's invoices for the First Application Period, I, in my capacity as the court-appointed Liquidator, and each of the professional firms that I engaged, agreed with the FTC to a one-time, across-the-board, 5% discount to be applied only to the fee portion of this application such that our combined invoiced fees in the amount of \$353,432.50 have been reduced by 5% to \$335,760.87 as the amount we are jointly seeking in this fee application.

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